

Fill in this information to identify the case:

Debtor 1

Leo J. Nixon

Debtor 2

(Spouse, if filing)

United States Bankruptcy Court for the: Western District ofPennsylvania

(State)

Case number 19-11217-JCM

Form 4100R

**Response to Notice of Final Cure
Payment****10/15**

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of Creditor: ABFC 2002-WF1 Trust, ABFC
Mortgage Loan Asset-Backed
Certificates, Series 2002-WF1,
U.S. Bank National
Association, as Trustee,
successor in interest to
Wachovia Bank, N.A. formerly
known as First Union National
Bank, as Trustee

Court claim no. (if known):

8-2Last 4 digits of any number you use to identify the debtor's account: XXXXXX2182**Property address:**2318 REED STREET

Number Street

Erie, PA 16503

City State ZIP Code

Part 2: Pre-petition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the pre-petition default on the creditor's claim. Creditor asserts that the total pre-petition amount remaining unpaid as of the date of this response is: \$_____

Part 3: Post-petition Mortgage Payment

Check one:

- Creditor states that the debtor(s) are current with all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next post-petition payment from the debtor(s) is due on: 03/01/2025
MM/DD/YYYY

- ☐ Creditor states that the debtor(s) **are not current** on all post-petition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

a. Total post-petition payments due:

(a) \$ 0.00

b. Total fees, charges, expenses, escrow, and costs outstanding

+(b) \$ 0.00c. **Total.** Add lines a and b(c) \$ 0.00

Creditor asserts that the debtor(s) are contractually
Obligated for the post-petition payment(s) that first became
Due on:

MM/DD/YYYY

Debtor 1

Leo J. Nixon

Case number 19-11217-JCM

First Name Middle Name Last Name

Part 4: Itemized Payment History

If the creditor disagrees in Part 2 that the pre-petition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all post-petition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

Part 5: Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box:

- ☐ I am the creditor
☒ I am the creditor's authorized agent

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X

/s/Kinnera Bhoopal

Signature

Date 02/12/2025

Print

Kinnera Bhoopal

First Name Middle Name Last Name

Title Authorized Agent for the Creditor

Company

McCalla Raymer Leibert Pierce, LLP

If different from the notice address listed on the proof of claim to which this response applies:

Address

325 Chestnut Street, Suite 725

Number Street

Philadelphia, PA 19106

City State Zip Code

Contact phone

(312) 348-9088 X5172

Email

Kinnera.Bhoopal@mccalla.com

	Bankruptcy Case	19-11217-JCM
	No.:	
In Re: Leo J. Nixon	Chapter:	13
	Judge:	John C. Melaragno

CERTIFICATE OF SERVICE

I, Kinnera Bhoopal, of McCalla Raymer Leibert Pierce, LLP, 325 Chestnut Street, Suite 725, Philadelphia, PA 19106, certify:

That I am, and at all times hereinafter mentioned, was more than 18 years of age;

That on the date below, I caused to be served a copy of the within Response to Notice of Final Cure Payment filed in this bankruptcy matter on the following parties at the addresses shown, by regular United States Mail, with proper postage affixed, unless another manner of service is expressly indicated:

Leo J. Nixon
2318 Reed Street
Erie, PA 16503

Daniel P. Foster,
Foster Law Offices
1210 Park Avenue
Meadville, PA 16335

(served via ECF Notification)

Ronda J. Winnecour, Trustee
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

(served via ECF Notification)

I CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on:	<u>02/12/2025</u>	By:	<u>/s/Kinnera Bhoopal</u>
	(date)		Kinnera Bhoopal, Pennsylvania BAR NO. Authorized Agent for the Creditor